

Ministerie van Economische Zaken en Klimaat  
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Den Haag

Geachte minister Wiebes

We feliciteren u van harte met het moedige besluit om de gaswinning in Groningen te beëindigen. Graag werken we met u samen om ook het gebruik van gas zo snel mogelijk afbouwen. Hiervoor en voor het EU klimaatbeleid in algemene zin, is het EU energiebeleid niet onbelangrijk.

Op de informele energieraad op donderdag 19 april bespreekt u met uw collega's de commissievoorstellen over de **Energy Efficiency Directive**, de **Renewable Energy Directive**, en de **Governance of the Energy Union Regulation**. Over deze drie voorstellen lopen nu *trilogue* onderhandelingen. De huidige positie van de raad strookt niet met de EU verplichtingen onder het Parijs akkoord en nog minder met de aanscherping die vermoedelijk nodig zal zijn na het komende IPCC-rapport. We roepen u daarom op om een toekomstgerichte energie en klimaatregelgeving te ondersteunen, zodat ondernemers die willen investeren in duurzame technologie snel duidelijkheid krijgen.

Helaas dreigt de *general approach* van de energieraad de bovenstaande richtlijnen en regulering te verzwakken. De voorstellen van de commissie waren al onvoldoende, zodat de transitie naar een schoon, efficiënt en eerlijk energiesysteem in Europa in gevaar is. Dit is natuurlijk volkomen in tegenspraak met de noodzaak om snel actie te komen voor het klimaat. Meer ambitie komt ten goede aan de Europese burgers. Het zorgt voor economische kansen, warme huizen, zuinige auto's, schone lucht en banen. Recent onderzoek door de Commissie laat zien dat door de snel dalende kosten, een 45% hernieuwbare energie doel, gecombineerd met een 40% efficiëntie verbetering niet leidt tot substantiële maatschappelijke kosten. Integendeel, een 45%-40% doelstelling leidt tot veel klimaatwinst, beperkt de importafhankelijkheid van gas en zorgt voor lagere zorgkosten. In de bijlage leest u hoe de Raad de voorliggende regelgeving kan verbeteren.

We rekenen op uw steun voor deze belangrijke onderwerpen tijdens de discussies op de informele energieraad. Heldere ambities op Europese schaal, jagen investeringen en innovatie aan en reduceren zo de kosten van het klimaatbeleid.

Met vriendelijke groet,



Donald Pols

directeur Milieudefensie

## **Annex: Priorities for Clean Energy Package files, Informal Energy Council 19 April**

### **Energy Efficiency Directive**

#### **Support the European Parliament's call for a binding energy efficiency target of at least 35% as a bare minimum**

This will offer greater benefits to European citizens and help the EU enact the Paris Agreement. In the General Approach for the Energy Efficiency Directive, you agreed with the European Commission's proposal for an EU energy efficiency target of 30% for 2030; however, it is clear that this level of ambition does not maximise the benefits for citizens and the economy. Furthermore, the target needs to be binding to provide regulatory certainty for investors but also ensure accountability for its delivery.

#### **Ensure that the energy savings obligation (Article 7) is a strong leveraging tool for energy efficiency investments.**

This provision was put in place to facilitate and accelerate the uptake of energy efficiency measures. It should remain the EU energy efficiency flagship tool for 2030 and beyond and not be diluted by loopholes that reduce its impact. For example, it is important to account for the transport energy use when estimating the energy savings that need to be achieved under Article 7, as this will encourage modal shift and cleaner transport modes in line with growing health concerns linked to air pollution. A clear and robust requirement can be a real leveraging mechanism for investors to undertake the energy efficiency investments needed to catalyse the energy transition.

### **Renewable Energy Directive**

#### **Support the European Parliament's call for a binding renewable energy target at least 35% target as bare minimum**

The current Council position of at least 27% was agreed upon before the successful outcome of the Paris Climate Conference and follows a Commission proposal based on outdated and overpriced cost assumptions for wind and solar. Such a low target would drastically slow down current levels of renewable energy deployment. The Council now needs to revise this target upwards. A recent report by the intergovernmental International Renewable Energy Agency (IRENA) suggests the EU could cost-effectively increase the share of energy it gets from renewable sources to 34% by 2030.

#### **Enshrine the rights of energy citizens and communities in legislation**

EU-level definitions of 'renewable self-consumers' and renewable energy communities should be supported. Renewable self-consumers should receive remuneration for electricity fed into the grid which also reflects its value to the environment and society. This will strengthen public support for the transition.

#### **Ensure that national support schemes are a driver for renewable energy deployment**

The Council should cement its position behind national support schemes. This should allow Member States to enact technology-specific tenders in ways that are tailored to local conditions and needs - which is good for diversity of supply and energy security - and provide specific support for small-scale installations and demonstration projects.

#### **Support only sustainable and low carbon bioenergy**

It is crucial that the revised Renewable Energy Directive includes stringent sustainability criteria for the use of bioenergy. The revised Directive should phase out all food and feed based biofuels by 2030, and should not include a renewable energy target for the transport sector. It should not support the use of whole trees for bioenergy production and the use of biomass for electricity production should only be supported when applying high efficient cogeneration technology.

## Governance of the Energy Union Regulation

### **Support the European Parliament's call for linear trajectories for energy efficiency and reliable provisions to fill ambition and delivery gaps**

Planning on the basis of linear trajectories for energy efficiency will ensure that both Member States and the EU as a whole will be able to assess whether they are on track to meet their 2030 targets, and to take action in due time if necessary. It is also a necessary provision to create investor certainty. The Council's approach with a non-linear, non-binding trajectory means delaying some of the investments to later in the period and create an unstable regulatory climate for projects and policies.

Further, putting the Commission in charge of monitoring progress of the EU as a whole and individual Member States towards reaching their trajectory, targets and objectives for both renewable energy and energy efficiency brings fairness and balance to the regulation. Should any gap emerge, adopting additional measures within one year is the safest option to ensure a closure of that gap. Should the EU as a whole not be on track to deliver, the Commission should be in charge to take measures at Union level, in addition to measures at national level, to ensure the achievement of the EU targets.

### **Ensure a binding, comparable National Energy and Climate Plan (NECP) template**

An integrated plan (NECP) that is regularly updated and improved is a step in the right direction to ensure the energy transition is properly managed and a sustainable energy future for Europe is successfully delivered. Revised NECPs should reflect an increase in ambition, as required by the EU's commitments under the Paris Agreement. The NECPs will also be industry's reference documents for making business. They need to include standardised and reliable information to be provided by all Member States in order to ensure accountability and comparability.

### **Ensure consistency between long term strategies and 2030 plans**

To comply with the long term goals of the Paris Agreement, global fossil fuel emissions need to be phased out and should be replaced by 100% renewable energy by 2050 at the latest. The long term climate and energy strategies must be designed to contribute to delivering on the long term objectives of the Paris Agreement. Coherence between the short term plans (NECPs) and ambitious long term strategies must then be ensured. To this end, the long term climate and energy strategies - by the Member States as well as the Commission on behalf of the Union - should be developed within the same time frame as the NECPs. A binding template for the long term strategies should also accompany the binding template for the NECPs. This would help to put in place enabling conditions for the deeper structural changes needed in the economy and energy system to reach the goals of the Paris Agreement.